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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**STIPULATION TO ENTRY OF JUDGMENT  
AGAINST DEFENDANT CITY OF CHICAGO**

Defendant City of Chicago hereby stipulates to the following:

1. Plaintiffs Deward Johnson and Arthur Bright have filed a Complaint against defendant City of Chicago and individual defendant police officers Johnson and Bady, among other defendants. Plaintiffs' Complaint includes various claims brought under federal and state law.

2. In plaintiffs' Complaint, plaintiffs claim that the individual defendant Chicago police officers violated their constitutional rights as a direct result of various policies, practices, and customs of the City of Chicago. Hence, plaintiffs have brought various *Monell* claims against the City.<sup>1</sup> In plaintiffs' Complaint, they seek a judgment against the City for damages caused by the alleged violations of their rights under the Constitution.

3. Without admitting plaintiffs' *Monell* allegations in their Complaint, the City agrees to entry of judgment against the City for compensatory damages and, to the extent allowed by the Court, reasonable attorneys fees pursuant to 42 U.S.C. §1988, if and only if the finder of fact in this case finds that any City employee violated plaintiffs' constitutional rights as

<sup>1</sup> See *Monell v. Department of Social Services of City of New York*, 436 U.S. 658 (1978).

alleged in their Complaint. The entry of any judgment against the City pursuant to this stipulation is accepted by the City only to the extent that the judgment is affirmed after any post-trial motions and/or an appeal if an appeal is taken.

Dated:

Respectfully submitted,

/s/ Daniel Noland

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